

Appl. No. 10/010,512
Amtd. dated November 21, 2003
Reply to Office Action of September 23, 2003

REMARKS/ARGUMENT

The Examiner is thanked for the careful review of this application. Applicant herein proposes to amend the Title of the invention to more accurately identify the subject matter in light of a restriction requirement and withdrawn claims. Claims 1-14 are pending in the application. Claim 1 is herein proposed to be amended to positively recite the SCSI application of a cable terminator, to positively recite the feature of the connection strip, and to more clearly recite the overmold as a single component material. Similarly, claim 10 is proposed to be amended to positively recite SCSI termination circuitry, and to more clearly recite the overmold as a single component material. Support for the proposed amendments is found throughout Applicant's specification as filed, and specifically at page 11, line 1 and lines 18-21, and page 17, lines 16-19. No new matter is introduced, and Applicant submits that the proposed claim amendments place the application in condition for allowance, or at the very least, reduce and clarify issues for appeal if such action is warranted. Applicant therefore submits entry of the presently proposed amendment is proper, and respectfully requests entry.

Applicant is filing this response within two months of the date of mailing of the Final Office Action in conformance with MPEP Section 714.13. A response in accordance with this section is kindly requested.

Rejections under 35 U.S.C. §102

Claims 1-4, 6, 7, and 9 were rejected under 35 U.S.C. §102(b) as being anticipated by Batten, Jr. et al. (U.S. Patent No. 6,097,613). This rejection is traversed, and Applicants request reconsideration.

Applicant's independent claim 1, as proposed to be amended herein, claims a cable terminator. The cable terminator includes a printed circuit board having SCSI termination circuitry. A ribbon cable having a first end and a second end is also recited. The first end is electrically connected to the printed circuit board to enable SCSI termination at the first end. The first end includes a connection strip defined by a portion of bare wire at the first end. The bare wire connects to pin connectors of the printed circuit board. The cable terminator also includes an encapsulating overmold. The encapsulating overmold is defined from a single component material and encloses the printed circuit board and the first end of the ribbon cable.

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Batten, Jr. et al. teach an assembly of an electronic device within a chamber defined by a flexible container. The device may be a printed circuit board, but is not further specified. Within the flexible container, conductors on the device are electrically isolated from an EMI protection layer which forms part of a laminate construction wall of the flexible container. Capacitive coupling is provided between the EMI protection layer and a ground conductor.

In order for a reference to anticipate a claim, each and every element as set forth in the claim must be found in the reference, either expressly or inherently described. MPEP 2131. Applicants respectfully submit that Batten, Jr. et al. do not anticipate Applicants' independent claims 1.

Specifically, Applicant is claiming a cable terminator with such enumerated features as a printed circuit board having SCSI termination circuitry, a ribbon cable having a connection strip connected at pin connectors on the printed circuit board, and an encapsulating overmold defined of a single component material and enclosing the printed circuit board and attached ribbon cable.

In the Office's "Response to Arguments" in paper No. 9, it would appear that the Office has fundamentally misconstrued Applicant's presently claimed invention. Specifically, the Office states that "In response to applicant's argument that Batten, Jr. et al. do not teach or suggest termination circuitry or that the ribbon cable is connected to the printed circuit board to enable termination, contrary to applicant's argument, fig. 1 clearly shows that the ribbon cable is connected to the printed circuit board by termination at the connector 14." Applicant submits that the Office has attributed a common, but incorrect, definition to the term "termination."

As used in the instant application, "cable terminator" describes a device or apparatus "[U]sed to terminate a ribbon or other suitable cable used to connect one or more SCSI, one or more LVD SCSI, or one or more similar devices to a SCSI host adapter, a motherboard having a SCSI chip, or a device such as a coupler, extender, or other connector connected to a SCSI host adapter or motherboard having a SCSI chip" (see Applicant's specification as filed, page 10, lines 7-12). A cable terminator, or terminator, is a *term of art*, that is well known and understood by one of ordinary skill in the art. In claim 1, Applicant claims a cable terminator, and while each and every general feature of a cable terminator is not recited in the claim, a definition of the general field of technology is not required in the claim to identify the claimed invention. In cited Fig. 1 of the Batten, Jr. et al. reference, insulated conductors 30 appear to "end" at elongate electrical connector 14, but Fig. 1 does not clearly show claimed cable terminator features. By

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way of example, nothing in Fig. 1 shows, teaches, or suggests SCSI termination circuitry. As is known, SCSI termination circuitry generally provides necessary impedance matching (see Applicant's specification as filed, page 2, lines 4-10). Applicant claims a cable terminator, not an end or terminus of a cable.

In order to explicitly state the relevant technology, Applicant proposes amending independent claim 1 to specifically recite SCSI in relation to termination and termination circuitry. The Batten, Jr. et al. reference teaches nothing of SCSI termination, and for at least this reason, fails to teach each and every feature of Applicant's independent claim 1.

Further, Applicant proposes to amend claim 1 to specifically recite that the overmold is defined of a single component material. As described at page 17, lines 16-21, the overmold is defined in one embodiment of ABS plastic to provide adequate insulation, protection, adhesion, and form (e.g., structure) in a light weight, rigid and durable material. Other embodiments utilize rubber, rubberized plastic or similar materials. The reference is not a single component material. At col. 3, lines 37-44, Batten, Jr. et al., recite "The container 16 is of laminate construction wall and requires an EMI protection layer for the purpose of preventing or substantially diminishing the amount of electromagnetic radiation penetrating the container either to or from electronic components 20 mounted upon the printed circuit board." Batten, Jr. et al. go on to teach a copper or other suitable conductive material as an EMI layer within the laminated container. For at least this reason, the reference fails to teach each and every feature of Applicant's independent claim 1.

Batten, Jr. et al. fail to anticipate Applicant's independent claim 1, and therefore fail to anticipate dependent claims 2-4, 6, 7, and 9. For at least the above reasons, Applicant respectfully submits that independent claim 1, and dependent claims 2-4, 6, 7, and 9, each of which directly or indirectly depends from independent claim 1, are not anticipated by the patent to Batten, Jr. et al., and Applicant respectfully requests reconsideration, and that the rejections be withdrawn.

Claims 1, 5, 10-12, and 14 were rejected under 35 U.S.C. §102(e) as being anticipated by Sanada et al. (U.S. Patent No. 6,442,027). This rejection is traversed, and Applicants request reconsideration.

Applicant's independent claim 1 is as described above. Applicant's independent claim 10 claims a SCSI cable having an integrated terminator. The SCSI cable and integrated terminator include a ribbon cable with a first end, a second end, and at least one device connector between the first end and the second end. The SCSI cable and integrated terminator also include a printed

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circuit board having termination circuitry. The termination circuitry is electrically coupled to the first end of the SCSI cable. Finally, the SCSI cable and integrated terminator includes an overmold sealing the printed circuit board and the first end of the SCSI cable. The overmold retains a single output path for the SCSI cable that extends to the second end.

Sanada et al. teach an electronic control unit having a control circuit substrate having control elements and a driving circuit substrate having driving elements separately positioned in a metal casing with a separating space there between to suppress heat transfer from the driving circuit substrate to the control circuit substrate.

Applicant respectfully submits that Applicant's independent claims 1 and 10 are not anticipated by Sanada et al. Specifically, Sanada et al. do not teach or suggest SCSI termination circuitry. See Figures 1, 2A, 2B, 3A, and 3B, for example, illustrating the control and driving circuitry which Sanada et al. explicitly and specifically teach. Also, Sanada et al. do not teach or suggest an encapsulating overmold. Without reciting additional features of Applicant's encapsulating overmold, Sanada et al. teach a casing 7 that is neither encapsulating, nor an overmold. As described by Sanada et al. at col. 4, lines 33 et seq., "The casing 7 is composed of an upper case 7a and a lower case 7b, and both cases 7a, 7b are connected by screws 8." The reference goes on to describe the contents and features of various surfaces of the casing 7.

Dependent claim 5 is not anticipated by the Sanada et al. reference for at least the same reasons as independent claim 1.

Regarding dependent claim 11, the Office suggests that Sanada et al. teach electrically passive circuitry. Applicant respectfully disagrees, submitting that control and driving circuitry is not electrically passive. In the "Response to Arguments" in Paper No. 9, the Office states that "applicant's disagreement without an explanation is not a proper response." Applicant reiterates that control and driving circuitry is not electrically passive. Applicant's claim 11 recites that the printed circuit board is electrically passive. Sanada et al. therefore do not teach each and every feature of Applicant's claim 11.

For at least the above reasons, Applicant respectfully submits that the Sanada et al. reference fails to teach, or suggest, each and every element as set forth in Applicant's independent claims 1, and 10, and therefore fails to anticipate claims 1 and 10. Similarly, for at least the same reasons, Sanada et al. fails to anticipate Applicant's dependent claims 5, 11-12, and 14, each of

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which depends, directly or indirectly, from one of independent claims 1 and 10. Applicant respectfully requests this rejection be withdrawn.

Rejections under 35 U.S.C. §103

Claims 10 and 13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Batten, Jr. et al. in view of Sanada et al. This rejection is traversed, and Applicants request reconsideration.

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, at the time of invention, to modify the reference or to combine reference teaching. Additionally, there must be a reasonable expectation of success, and the combination of prior art references must teach or suggest all of the claim limitations. Applicant respectfully submits that the Office has failed to establish a *prima facie* case of obviousness.

The Office asserts that Batten, Jr. et al. teach each and every feature of independent claim 10 except for at least one device connector between the first end and the second end of the cable. Applicants respectfully disagree and request reconsideration. As described above, Applicant has positively recited in independent claim 10 SCSI termination circuitry, and SCSI termination circuitry being electrically coupled to the first end of the SCSI cable. Batten, Jr. et al. do not teach or suggest SCSI termination circuitry as asserted by the Office. Further, the combination of Batten, Jr. et al. and Sanada et al. do not teach SCSI termination circuitry. Therefore, the combination of Batten, Jr. et al. and Sanada et al. as asserted by the office, *i.e.*, "it would have been obvious to one having ordinary skill in the art at the time the invention was made to modify batten, Jr. et al. invention by adding an additional connector between the first end and the second end of cable 32 in order to make the cable 32 versatile" fails to teach or suggest all the claim limitations of Applicant's independent claim 10.

For at least the above reasons, the combination of Batten, Jr. et al. and Sanada et al. fail to teach or suggest all of the claim limitations of Applicant's independent claim 10. For at least the same reasons, the asserted combination fails to teach or suggest all of the claim limitations of Applicant's dependent claim 13, which depends directly from independent claim 10. Applicant further notes that the modification of the Batten, Jr. et al. reference as suggested by the Office, *i.e.*, that it would have been obvious to construct "the connector housing" of a rubberized plastic

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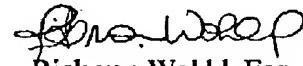
material" lacks the requisite motivation for modification since the proposed modification renders the prior art unsatisfactory for its intended purpose. (see MPEP §2143.01) Specifically, see Batten, Jr. et al. col. 3, lines 37-45, and above discussion. Applicant therefore respectfully requests these rejections be withdrawn.

Claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over Batten, Jr. et al. This rejection is traversed, and Applicants request reconsideration. Similar to the above, Applicant submits that Batten, Jr. et al. fail to teach or suggest all of the claim limitations recited in Applicant's independent claim 1, from which dependent claim 8 directly depends. Further, as above, Applicant submits that the asserted combination lacks the requisite motivation since the proposed modification renders the prior art unsatisfactory for its intended purpose. Since Batten, Jr. et al. do not teach suggest all of Applicant's claim limitations, the reference fails to render Applicant's application obvious, and Applicant respectfully requests the rejections be withdrawn.

Applicant respectfully submits that claims 10, 13, and 8 are patentable under 35 USC §103(a) over Batten, Jr. et al. and Sanada et al., and any combination thereof. Applicant requests reconsideration and that the rejections be withdrawn.

In view of the foregoing, Applicants respectfully request entry of the presently proposed Amendment, and reconsideration of claims 1-14. Applicant submits that all claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. If Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900, ext. 6905. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. ADAPP202). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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